

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
ALEX BRISCOE, Agency Director



March 13, 2012

ENVIRONMENTAL HEALTH DEPARTMENT
Certified Unified Program Agency (CUPA)
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
Phone (510) 567-6700
FAX (510) 337-9335

Mr. Steve Lee
3643 Ferry Lane
Fremont, CA 94555

Daniel V. Gulino, Esq.
Senior VP, General Counsel
Byron Power Partners L.P.
14 Philips Parkway
Montale, NJ 07645

Subject: Facility Closure- Byron Power Company, 4901 Bruns Road,
Byron, CA 94568

Dear Messrs. Lee and Gulino:

Alameda County Department of Environmental Health (ACDEH) has received and reviewed the Facility Closure Notification Form submitted to our office by Daniel V. Gulino, Esq., General Counsel for Byron Power Partners, L.P. ACDEH Certified Unified Program Agency (CUPA) will be overseeing the facility closure and Alameda County Environmental Health Local Oversight Program (LOP) will be overseeing site remediation of impacted soil and/or groundwater. Your LOP contact is Mr. Jerry Wickham, who can be reached at 510-567-6791. Upon review of the facility closure form, ACDEH has the following comments and requirements:

1. Facility Closure Notification form appears to have been incorrectly filled out. The following items were not checked on the closure form but appear applicable to this facility closure: generated hazardous waste, compressed gas cylinders, aboveground tanks, parts washer, trenches/containment areas, other i.e. equipment and piping. Please confirm that these are additional applicable facility closure items.
2. General site and facility maps/diagram referenced in the Attachment to Initial Facility Closure Notification Form lacked the detail to indicate the past locations of chemical usage and/or storage of hazardous materials/waste. It appears that this some if not all of this information is found on the site map attached to the closure plan notification form but the legend of this map is missing. Please review this site map, confirm this information is correct and inclusive of historic activities and send the missing information to our office.
3. Contaminated or potentially contaminated equipment, including piping, vats, tankage and process vessels. Under this section, the closure

notification forms states "there are no known contaminated or potentially contaminated equipment on site". However, it appears that the used oil and coolant aboveground tanks and possibly oil filled equipment fit this category. Please insure that the tanks are managed consistent with Title 22, Chapter 32, Section 67383.1 et al.

4. Specific Information within closure:
 - Hazardous Waste/Hazardous Materials Disposal Manifests and Receipts should be tabulated indicating the location, source, waste identification and waste amount. The hazardous materials disposal receipts should include the materials noted in the July 30, 2008 Phase I/HMBP reports including ethylene glycol, Chemisis 6190, used oil, motor oil, Water Care 2381, Watercare 2323, Brominating Tablets, mineral spirits and lubricating fluids from electrical equipment, free product chemicals spilled into secondary containment, oily water, etc.
 - Equipment, Piping Disposition- Please confirm that the cooling towers, evaporators, electrical equipment and engines will remain at the facility and indicate whether all chemicals from the equipment remain in the equipment or have been removed/disposed.
 - Non-hazardous Materials Disposition- Provide receipts for the disposition (disposal, sales, donation or recycling) of any non-hazardous materials including stockpile soil, salts, waste water, rinse water from the cleaning of containment areas or containers, scrap metal, used equipment, etc.
 - Compressed gas cylinders- provide receipts for the return or disposal of all gas cylinders including but not limited to oxygen, acetylene, carbon monoxide and nitric oxide.
 - Aboveground tanks- please document the disposition of all aboveground tanks and their contents and state whether they were reused, disposed or recycled. Please also provide this information for any parts washers, degreasing units or other cleaning equipment.
 - Empty containers- please state whether empty containers have been reused, recycled or disposed and provide documentation if available.
 - Universal Waste- please provide documents for the disposal of fluorescent lights, batteries and ballasts, electronic devices and any other universal waste.

5. Please work with the County's LOP group to determine if additional sampling is required to complete the subsurface investigation of chemical releases to soil and groundwater.

6. Please notify the undersigned at 510-567-6765 after completing your closure activities to allow for an inspection of the facility.
7. Please provide a copy of your final closure report to our office within 30 days of completion of all closure work.

Sincerely,



Barney M. Chan
Sr. Hazardous Materials Specialist

C: S. Hugo, CUPA Manager, ACDEH
Ms. Laurie Schrum, Kroloff, Belcher, Smart, Perry & Christopherson, 7540
Shoreline Drive, Stockton, CA 95219
J. Wickham, ACDEH
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